

Jesse Rochman

From: Jesse Rochman <jrochman@sandbergphoenix.com>
Sent: Wednesday, April 10, 2013 3:00 PM
To: Martin L. Daesch; twolf@bjpc.com; rcarter@bjpc.com
Subject: RE: Discovery due [IWOV-LIB1.FID455371] [SPVG-LIB1.FID455371]

Tim,

Title 28 United States Code Section 1450 provides that, upon removal of a case from state court to federal court, "[a]ll injunctions, orders, and other proceedings had in such action prior to its removal shall remain in full force and effect until dissolved or modified by the district court." 28 U.S.C. § 1450. Prior to removal, GCAC was ordered to produce "the presale notices sent for the years 2009-2012 along with the Retail Installment Contract and Security Agreement related to those presale notices" within 30 days of March 12, 2013. See Orders in your Notice of Removal at Doc. No. 1-7, pp. 2, 13. These orders remain in full force and effect because they have not been dissolved or modified by the district court.

Jesse Rochman
Sandberg Phoenix & von Gontard P.C.
600 Washington Avenue - 15th Floor
St. Louis, MO 63101
Direct Dial: 314.446.4310
Tel: 314.231.3332
Fax: 314.241.7604
jrochman@sandbergphoenix.com
<http://www.sandbergphoenix.com>

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From: Martin L. Daesch
Sent: Wednesday, April 10, 2013 2:31 PM
To: twolf@bjpc.com; rcarter@bjpc.com
Cc: Jesse Rochman
Subject: Discovery due [SPVG-LIB1.FID455371]

Tim,

Following up with our conversation from this afternoon....pursuant to the court's scheduling order and order denying the motion for protective order in the state court, we believe that the discovery is due tomorrow. Jesse will send you a copy of the removal statute and court order later today. Thank you.

Marty